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November 18, 2008

VIA ELECTRONIC MAIL AND FIRST CLASS MAIL

Honorable Paul W. Grimm
Chief United States Magistrate Judge
Garmatz Federal Courthouse
101 W. Lombard Street
Baltimore, Maryland 21201

> Re: **Glenda Mancia, et. al. v. Argo Enterprises, et. al.**
> **In the United States District Court for the District of Maryland**
> **Civil No.: 08-CV-00273-CCB**

Dear Judge Grimm:

As you know, Andrew Nichols and I represent Argo Enterprises, Inc. ("Argo") in this case. Argo is the one defendant in this matter not associated with Mr. Mehta and various Mayflower and Lunil entities, represented by Mr. Pelletier. Argo objects to the November 11, 2008 letter (the "Letter") submitted by Plaintiffs' counsel in conjunction with the filing of the "template" contemplated in your September 29, 2008 Order. I do not wish to rehash the points made by Mr. Pelletier in his letter of earlier today. I simply wish to state, for the record, that Argo joins Mr. Pelletier's clients in their request that the Letter be stricken.

Argo is particularly disturbed at Plaintiffs' efforts to paint Argo as a somehow recalcitrant defendant by making multiple document productions. Argo has produced documents on four (4) separate occasions in an effort to comply with Plaintiffs' substantial document requests. Further, Argo feels unfairly sandbagged that Plaintiffs, for the first time since discovery had begun in this case, have chosen to point out that Argo has somehow failed to follow the rules by failing to identify each document produced by the request number that it is responsive to.

As Mr. Pelletier stated, counsel in this case have actually worked together and had many productive phone calls and exchange of correspondence to properly manage the substantial volume of discovery in this case.

Thank you for your consideration.

Sincerely,

Neil S. Hyman

cc: All Counsel